

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11
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DELPHI CORPORATION, et al., : Case No. 05-44481 (RDD)
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Debtors. : (Jointly Administered)
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OBJECTION BY A-1 SPECIALIZED SERVICES & SUPPLIES, INC.
TO NOTICE OF CURE AMOUNT

Introduction

1. A-1 Specialized Services & Supplies, Inc. ("A-1") is a supplier of platinum, palladium and rhodium ("platinum group metals" or "PGM") to industrial users. Throughout its existence, Delphi Corporation ("Delphi") has purchased PGM from A-1 for use in the manufacturing of automotive components. A-1 also reclaims PGM from industrial manufacturing scrap. Throughout its existence, Delphi has purchased the reclamation services of A-1 to recover PGM from its automotive manufacturing scrap. Delphi has continued during the administration of the bankruptcy to purchase PGM and reclamation services from A-1.
2. Delphi now proposes to sell substantially all of the assets used in its automotive catalyst business to Umicore S.A., a Belgian limited liability corporation, and to assign certain supply and reclaim contracts with A-1 to Umicore.
3. In relation to that proposed sale and assignment, Delphi has asserted that the cure amount regarding prepetition arrearages of A-1 is \$430,384.00.

4. A-1 objects to this assertion. The prepetition arrearages due to A-1 are the metals that were in the possession of Delphi as of the date of the petition: platinum – 500 troy ounces; palladium – 4000 troy ounces; rhodium – 300 troy ounces.

5. The court should further understand that A-1 set off those prepetition arrearage metals in the possession of Delphi against metals that were, at the time of the Delphi petition, in the possession of A-1. This information may need to be taken into consideration in relation to the proposed sale of the catalyst manufacturing assets.

Dated: Croydon, Pennsylvania
July 12, 2007

A-1 Specialized Services & Supplies, Inc.

By: _____
Ashok Kumar, Owner
P.O. Box 270
Croydon, PA 19021
(215) 788-9200

Certification of Service

The foregoing response of A-1 Specialized Services & Supplies, Inc. was sent to the following on July 12, 2007:

Original in paper form, and as a Microsoft Word file on a 3.5 inch disk
by Federal Express

United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, NY 10004

Copies in paper form
by Federal Express and United States mail

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Attn: Legal Staff

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Attn: Deputy General Counsel, Transactions and Structuring

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